

From: [Hunt, Laura](#)
To: [Pinon, Abram CIV USARMY CESWF \(USA\)](#)
Subject: RE: Alcoa (Point Comfort)/Lavaca Bay Superfund Site: Matagorda Ship Channel
Date: Monday, December 13, 2021 11:56:00 AM
Attachments: [image001.png](#)
[image002.png](#)

Hi Abe,

I have a few follow-up questions for the MSCIP project:

- It is EPA's understanding that an area of Dredge Island was allocated to the Corp for disposal. However, during our previous call, the Corp confirmed that disposal would not occur at dredge island due to stability issues. Has the Corp identified an alternative confined disposal area for any sediment that requires confined disposal? Does the Corp intend to conduct any modifications to the allotted area at Dredge Island so that it would be suitable for disposal?
- What is the status of providing a response to the following question:
 - Section 5.3.11 Water Quality and 5.3.12 Sediment Quality (p. 159 EIS):
indicates that *"Under the recommended plan, factors that could affect DO include the increase in both water circulation and salinity"* and that *"There is potential for a change in bay-bottom velocities due to a wider and deeper channel and the actions taken as part of the DMMP."* The predominant remedy in the closed area at the Alcoa (Point Comfort)/Lavaca Bay Superfund Site is monitored natural attenuation (MNA). Has the Corps evaluated with modeling or some other analysis whether changes in bay-bottom velocity could potentially have any impacts to site MNA? Also, has the Corps evaluated possible impacts to MNA from increased shipping activity?
- Per the EIS, sediment was characterized for mercury content based on historical datasets and the Adaptive Sediment Management Framework applied for determining disposal (Section 1.4.3 of the EIS). Just reconfirming that no additional data has been collected since the EIS to characterize mercury in sediment in the MSCIP project area and that decisions on how sediment is to be disposed/handled are based solely on data contained within the EIS?

Thanks,

Laura Hunt, PhD

Remedial Project Manager
Superfund and Emergency Management Division
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270
P: 214-665-9729

From: Pinon, Abram CIV USARMY CESWF (USA) <Abram.Pinon@usace.army.mil>

Sent: Monday, October 18, 2021 7:39 AM

To: Hunt, Laura <Hunt.Laura@epa.gov>

Cc: Ford, Christopher B CIV USARMY CESWF (USA) <Christopher.B.Ford@usace.army.mil>; Finn, Lisa M CIV USARMY CESWG (USA) <Lisa.M.Finn@usace.army.mil>; Nealy, Franchelle E CIV USARMY CESWG (USA) <Franchelle.E.Craft@usace.army.mil>; Neill, Ashley N CIV USARMY CESWG (USA) <Ashley.N.Neill@usace.army.mil>

Subject: RE: Alcoa (Point Comfort)/Lavaca Bay Superfund Site: Matagorda Ship Channel

Importance: High

Laura,

Good morning. Based on our telecon on 07-27-2021, USACE was under the impression that you did not need to see the sampling and analysis plan beforehand as documented in Part 2.e in the attached minutes. The locations being sampled are based on us piggybacking on Geotech borings in order to use their drilling equipment. That equipment/work is expensive that we weren't mobilizing ourselves. The proposed sampling areas were overlaid with our traditional sampling areas to evaluate on a historical context. I am still waiting on a response to your first question, but a response to your second question is provided below.

1. Still waiting for a response.
2. Based on Table 39 of the EIS, New Work material [excavation beyond the current maintenance levels] from the area around the ALCOA Superfund site will go to unconfined Placement Areas NP6 and NP7. Attached email provides a map that shows the placement areas.

I am available at 1500 hrs tomorrow afternoon; however I would like to pull in some of our subject matter experts into the call if at all possible. Please let me know if the proposed time works for you and I will try to get as many of these people on the phone call with you.

Thank you,

Abe Piñon, P.E.

Environmental Engineer

Regional Planning & Environmental Center

Environmental Branch-Technical Section (PEE-T)

U.S. Army Corps of Engineers

Office: (817) 886-1064

Cell: (817) 223-7504

Abram.Pinon@usace.army.mil

From: Hunt, Laura <Hunt.Laura@epa.gov>

Sent: Thursday, October 14, 2021 2:28 PM

To: Pinon, Abram CIV USARMY CESWF (USA) <Abram.Pinon@usace.army.mil>

Cc: Ford, Christopher B CIV USARMY CESWF (USA) <Christopher.B.Ford@usace.army.mil>
Subject: [Non-DoD Source] RE: Alcoa (Point Comfort)/Lavaca Bay Superfund Site: Matagorda Ship Channel

Hi Abe,

Thank you for the update. Can we have a call on Monday or Tuesday?

Laura

From: Pinon, Abram CIV USARMY CESWF (USA) <Abram.Pinon@usace.army.mil>
Sent: Thursday, October 14, 2021 12:26 PM
To: Hunt, Laura <Hunt.Laura@epa.gov>
Cc: Ford, Christopher B CIV USARMY CESWF (USA) <Christopher.B.Ford@usace.army.mil>
Subject: RE: Alcoa (Point Comfort)/Lavaca Bay Superfund Site: Matagorda Ship Channel

Laura,

I am currently awaiting a response from some team members. I will get a reply to you once I get all responses in. I am sorry of the delay.

Abe Piñon, P.E.
Environmental Engineer
Regional Planning & Environmental Center
Environmental Branch-Technical Section (PEE-T)
U.S. Army Corps of Engineers
Office: (817) 886-1064
Cell: (817) 223-7504
Abram.Pinon@usace.army.mil

From: Hunt, Laura <Hunt.Laura@epa.gov>
Sent: Thursday, October 14, 2021 11:34 AM
To: Ford, Christopher B CIV USARMY CESWF (USA) <Christopher.B.Ford@usace.army.mil>
Cc: Pinon, Abram CIV USARMY CESWF (USA) <Abram.Pinon@usace.army.mil>
Subject: [Non-DoD Source] RE: Alcoa (Point Comfort)/Lavaca Bay Superfund Site: Matagorda Ship Channel
Importance: High

Brandon,

A Community Advisory Board (CAB) meeting for the Alcoa/Lavaca Bay superfund site is scheduled for later this month. It is important that EPA have the latest update/status on the Matagorda Ship

Channel project. Do you have availability for a call next week? Please let me know as soon as possible if you have any responses to my previous email. Thanks,

Laura Hunt, PhD

Remedial Project Manager
Superfund and Emergency Management Division
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270
P: 214-665-9729

From: Hunt, Laura
Sent: Tuesday, October 12, 2021 5:16 PM
To: Ford, Christopher B CIV USARMY CESWF (USA) <Christopher.B.Ford@usace.army.mil>
Cc: Pinon, Abram CIV USARMY CESWF (USA) <Abram.Pinon@usace.army.mil>
Subject: Alcoa (Point Comfort)/Lavaca Bay Superfund Site: Matagorda Ship Channel

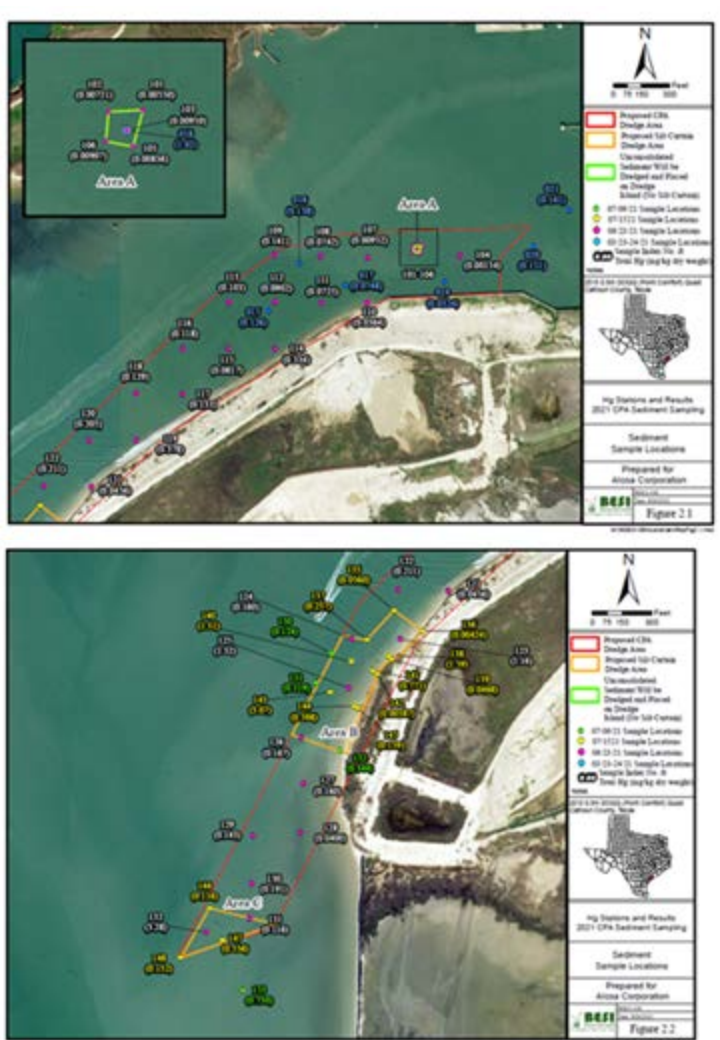
Hi Brandon,

On May 14 you sent a re-cap email stating that there will be future meetings on the project's dredge material management plan and sediment testing plan. Do you have a status on those documents because I heard that a contract had been awarded for the sediment testing plan. EPA would like the opportunity to review and comment on the sediment testing and dredge material management plans. My concern is that the proposed dredge area is adequately characterized as there are still potential hotspot areas that exceed sediment RAOs for mercury within the Corp's project area. See attached results from recent sediment sampling conducted in the LNG terminal project area by Alcoa that is adjacent to the Corp's proposed turning basin area.

Lastly, EPA is still awaiting to hear back on questions from our June 25 letter. Please provide a status update on the following:

- **Section 5.3.11 Water Quality and 5.3.12 Sediment Quality (p. 159 EIS):** indicates that *“Under the recommended plan, factors that could affect DO include the increase in both water circulation and salinity”* and that *“There is potential for a change in bay-bottom velocities due to a wider and deeper channel and the actions taken as part of the DMMP.”* The predominant remedy in the closed area at the Alcoa (Point Comfort)/Lavaca Bay Superfund Site is monitored natural attenuation (MNA). Has the Corps evaluated with modeling or some other analysis whether changes in bay-bottom velocity could potentially have any impacts to site MNA? Also, has the Corps evaluated possible impacts to MNA from increased shipping activity?

- Section 4.2.2 Impacted Sediments (p.49 EIS): states that “Based on the analyses, all average mercury concentrations were below the RAO of 0.25 mg/kg for critical habitats (marsh-type) and therefore, there should be no restrictions on the use of the dredged material.” EPA is requesting clarification on where the Corps intends to place dredge material removed from the closed area and whether there will be confirmatory sampling before disposal occurs. Placement of site associated material outside the superfund site may invoke land disposal restrictions.



Please let me know when you are available to discuss this further. Thanks,

Laura Hunt, PhD

Remedial Project Manager

Superfund and Emergency Management Division
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270
P: 214-665-9729